

**HEXCEL**

November 12, 1993

SDMS Document



88369

VIA FEDERAL EXPRESS

Mr. Joseph Novak  
Case Manager  
Industrial Site Evaluation Element  
New Jersey Department of Environmental  
Protection and Energy  
CN-028  
401 East State Street  
Fifth Floor  
Trenton, New Jersey 08625-0028

**RE:** *Hexcel Corporation*  
*205 South Main Street*  
*Lodi, Bergen County*  
*ISRA CASE NO. 86009*

Dear Mr. Novak:

Pursuant to your letter of October 26, 1993 and further, to my letter also dated October 26, 1993, Hexcel would like to offer the following comments:

I. Soils

- Item 1. No comment necessary.
- Item 2. Hexcel has reviewed the referenced drawings and will address this issue in the future. Please refer to the response to Item 5 for further information.
- Item 3. Please refer to the response to Item 5.
- Item 4. Please refer to the response to Item 5.
- Item 5. Hexcel Corporation is currently unable to finance all of the planned remedial activities at the above referenced site for the next six to eleven months. As stated previously in the April Progress Report, the soil quality at the site does not represent an immediate concern. There is no direct contact, dermal, ingestion, or inhalation exposure risk associated with these soils. Furthermore, the contaminated soils are covered by asphalt. Therefore, the

Re: *Hexcel Corporation*  
ISRA CASE NO. 86009

amount of infiltrating water which mobilizes contaminants into groundwater is negligible. Hexcel feels that the contaminated soils present a low human health and environmental risk.

Given this position, Hexcel feels that during the next six to eleven month period, issues which present an immediate concern (i.e. free product and basement seepage water), should be the focus of attention. (Please refer to the discussion in Item 12.)

Hexcel proposes the deferral of any soils remedial issues for the next six to eleven months. Items 1 through 4 of this letter will be addressed upon conclusion of the six to eleven month period. At that time, a revised soils remediation time schedule will be submitted.

## II. Groundwater

Item 6. Please refer to the response to Item 12.

Item 7. CW-3 has been equipped with a pump. The pumping system has been tested and is in working order.

Item 8. Hexcel began pumping DNAPL from wells MW-6, MW-8 and CW-16 on September 17, 1993, as documented in the August Progress Report, submitted on September 20, 1993. Additionally, Hexcel has continued to pump MW-6, MW-8 and CW-16 for DNAPL recovery until no DNAPL is observed. DNAPL recovery performed on September 24, and October 1, 1993, has been documented in the Progress Report for September. DNAPL was also recovered on October 8, 1993 and will be documented in the October Progress Report. Since no DNAPL has been detected during monitoring in RW7-1 and RW7-5, the DNAPL recovery system installed in these two wells has not been operated, and no pump has been installed in MW-8. However, as mentioned above, Hexcel has been pumping MW-6, MW-8 and CW-16, and any other wells exhibiting DNAPL accumulation, on an individual basis.

As discussed above, Hexcel is currently unable to finance all of its planned remedial strategies. Therefore, Hexcel requests that evaluation of the proposal to install a barrier along the Saddle River to prevent the migration of DNAPL be deferred until the completion of the six to eleven month period. Hexcel feels that regular pumping of individual wells exhibiting DNAPL may alleviate this concern.

Re: *Hexcel Corporation*  
ISRA CASE NO. 86009

Item 9. MW-8 has not ben connected to the DNAPL recovery system.

Item 10. CW-17 will be added to the DNAPL monitoring.

Item 11. Please refer to the response to Item 12.

Item 12. As the NJDEPE is aware, the most significant issue(s) associated with the Lodi site are related to groundwater, most notably the presence of DNAPLs and LNAPLs. Efforts to recover these free phase liquids are currently underway.

Hexcel considers this effort to be uppermost on its agenda of remedial priorities. Hexcel has expended considerable resources in achieving environmental compliance at this site, and continues in its commitment to achieve the remedial objective identified for the site. However, at this time, due to serious financial constraints, Hexcel requests that the groundwater remedial effort be scaled down to include the following:

1. Regular recovery of LNAPL and DNAPL;
2. Operation of the physical/chemical treatment system for contaminated groundwater which seeps into the facility basement. This system would continue its current operational schedule which involves the collection and treatment of the contaminated basement seepage water on a batch basis; and,
3. Monthly DNAPL/LNAPL/Groundwater monitoring.

Hexcel feels that the continuation of these activities will allow Hexcel to address the immediate environmental concerns at the site.

Hexcel has pursued the Lodi site project for over seven years with the greatest of diligence and financial resources. Hexcel hopes to resume full scale remedial activities in six months, but does foresee the possibility of extending this period to eleven months. Hexcel remains committed to completing the approved cleanup as soon as financially feasible.

Mr. Joseph Novak, Ca. Manager

November 12, 1993

Page -4-

Re: *Hexcel Corporation*  
ISRA CASE NO. 86009

Item 13. No comment necessary.

Item 14. No comment necessary.

Hexcel would like the opportunity to discuss this request and answer any questions or comments. Please call our New Jersey counsel, Edward A. Hogan, at (201) 538-4006, to arrange a mutually convenient meeting date.

Thank you for your consideration.

Sincerely,

HEXCEL CORPORATION

A handwritten signature in cursive script, appearing to read "A. William Nosil".

A. William Nosil

Corporate Environmental Engineering Manager

cc: Edward A. Hogan\Porzio, Bromberg & Newman

AWN;sfv

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